

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil Action No. 5:09-cv-00449

R. DANIEL BRADY ET AL.,)
Plaintiffs,)
v.)
XE SERVICES LLC ET AL.,)
Defendants.)

)

DEFENDANT JEREMY P. RIDGEWAY'S MOTION TO DISMISS THE COMPLAINT

Pursuant to Local Civil Rule 7.1 and Rule 12(b)(2) of the Federal Rules of Civil Procedure (“Rules”), Defendant Jeremy P. Ridgeway hereby moves to dismiss Plaintiffs’ Complaint. Defendant Ridgeway’s Motion to Dismiss should be granted because this Court lacks personal jurisdiction over Defendant Ridgeway. The grounds for this Motion to Dismiss are set forth more fully in the accompanying Memorandum in Support.

WHEREFORE, Defendant Ridgeway respectfully requests that the Court grant his Motion.

Respectfully submitted this 24th day of December, 2009.

By: /s/ Edward H. Maginnis
Edward H. Maginnis (Bar No. 39317)
MAGINNIS LAW
6030 Creedmoor Road, Suite 200
Raleigh, NC 27612
Telephone: 919.526.0450
Facsimile: 919.882.8763
emaginnis@maginnislaw.com

Jack M. Knight, Jr. (Bar No. 21145)

WINSTON & STRAWN LLP
214 North Tryon Street
Charlotte, North Carolina 28202-1078
Telephone: 704.350.7700
Facsimile: 704.350.7800
jknight@winston.com

Counsel for Defendant Jeremy P. Ridgeway

CERTIFICATE OF SERVICE

I hereby certify that I caused copies of the foregoing Motion to Dismiss to be transmitted on December 24, 2009, to all counsel registered to receive electronic service:

James A. Roberts III
jimroberts@lewis-roberts.com
LEWIS & ROBERTS, PLLC
3700 Glenwood Avenue, Suite 410
Raleigh, NC 27612

Gary V. Mauney
garymauney@lewis-roberts.com
LEWIS & ROBERTS, PLLC
5960 Fairview Road, Suite 102
Charlotte, NC 28210

Attorneys for plaintiffs

Keith Harrison Johnson
kjohnson@poynerspruill.com
POYNER SPRUILL LLP
P.O. Box 1801
301 Fayetteville St., Suite 1900
Raleigh, NC 27602-1801

*Attorneys for defendants Donald Wayne Ball,
Dustin L. Heard, Evan Shawn Liberty,
Nicholas Abram Slatten, and Paul Alvin
Slough*

Eric H. Cottrell (N.C. Bar No. 21994)
ecottrell@mayerbrown.com
MAYER BROWN LLP
214 North Tryon Street, Suite 3800
Charlotte, North Carolina 28202
(704) 444-3500
(704) 377-2033 (fax)

*Attorneys for Defendants Xe Services LLC,
Blackwater Security Consulting LLC, U.S.
Training Center, Inc., Raven Development
Group LLC, GSD Manufacturing LLC, Prince
Group, LLC, Total Intelligence Solutions LLC,
Greystone Limited a/k/a Greystone Ltd.,
Terrorism Research Center, Incorporated,
Technical Defense Associates, Incorporated,
Aviation Worldwide Services, L.L.C., Guardian
Flight Systems LLC, Presidential Airways,
Inc., STI Aviation, Inc., Air Quest, Inc.,
Samarus Co. Ltd. and Erik Prince*

Jack M. Knight, Jr.
jknight@winston.com
WINSTON & STRAWN LLP
214 North Tryon Street
Charlotte, NC 28202-1078

Attorneys for defendant Jeremy P. Ridgeway

/s/ Edward H. Maginnis
Edward H. Maginnis